August 31, 2020

The Honorable Andrew Wheeler
Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue NW
Mail Code: 1101A
Washington, DC 20460

Cc: filed electronically at wheeler.andrew@EPA.gov

RE: Dicamba Herbicide Product Registration

Dear Administrator Wheeler:

The undersigned coalition of Kansas agricultural stakeholders have joined together to request an expedited agency action on the issuance of new registrations and product labels for the dicamba herbicide products known as Xtendimax®, Engenia®, and Tavium®.

Kansas is a leading producer in agricultural commodities. Regulatory actions affecting our ability to apply crop protection inputs, such as dicamba, will affect the ability of agricultural commodity producers in Kansas to continue to be successful.

We are requesting that the agency consider and approve a multi-year registration of product labels with over-the-top, post-emergent application directions on dicamba-tolerant crops that are clear and understandable for producers and commercial applicators, and that the new registration be released in the near future.

New formulation dicamba products, when applied in accordance with label directions and in conjunction with dicamba-tolerant trait crops, have been used effectively in the production of soybeans and cotton in Kansas.

Use of over-the-top, post-emergent application of dicamba herbicide on dicamba-tolerant crops has become an essential part of controlling post emergent weed growth and ensuring that crops are able to make use of the available water and nutrients in the soil. This allows the plant to maximize yield potential, optimizing overall production efficiency, and decreasing the need for water and fertilizer. Dicamba broadens the spectrum of weed species control and weed resistance management. The use of dicamba frequently reduces the need for application of potentially less safe alternative herbicides which may require multiple applications.

Dicamba is a very effective weed control option for Kansas farmers. Use of products like dicamba allow for the sustainability of agricultural crop production. In Kansas, where drought conditions often persist, preserving moisture levels in soil is critical.

Conservation tillage allows farmers to disturb less soil, and reduce soil erosion and carbon emissions. The use of dicamba herbicide allows more Kansas farmers to adopt "no-till" and other conservation tillage methods which diminish soil compaction, preserve soil moisture, and reduce energy usage by limiting the number of times tractors traverse farm ground.

Historic reliance on a limited array of herbicides has created weed resistance in Kansas and many areas of the United States. Dicamba herbicide adds to the diversity of crop-protection products available to Kansas producers, and provides them a wider range of products with varying modes of action.

Use of dicamba herbicide enhances the quality and quantity of agricultural commodities grown in Kansas, and allows our producers to be more competitive. The entire Kansas agricultural industry and economy would suffer harm from the loss of over-the-top, post-emergent application of dicamba as a viable crop protection option.

Thank you for the opportunity to submit these comments. As crop rotation and input decisions for next year are being made by agricultural producers right now, we urge the agency to issue new registrations for these products as soon as possible.

Respectfully,

Kansas Agribusiness Retailers Assocation
Kansas Soybean Association
Kansas Cotton Association
Kansas Farm Bureau
Kansas Association of Conservation Districts
Kansas Cooperative Council
Kansas Grain and Feed Association
Renew Kansas Biofuels Association